

1 LENARD E. SCHWARTZER
2 2850 S. Jones Blvd., Ste 1
3 Las Vegas, NV 89146
4 (702) 307-2022

5 TRUSTEE

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7
8 UNITED STATES BANKRUPTCY COURT
9 DISTRICT OF NEVADA

10 In re) Case No. BK-S 20-10752-ABL
11 JIMENEZ ARMS, INC.,) IN PROCEEDINGS UNDER CHAPTER 7
12) EX-PARTE APPLICATION TO EMPLOY
13) GENSKE, MULDER & COMPANY, LLP, AS
14) SPECIAL ACCOUNTANT
15) (No Hearing Required)
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Debtor.

17 LENARD E. SCHWARTZER, Trustee herein, makes application to employ special
18 accountant, and alleges:

- 19 1. This case was commenced by the filing of a Chapter 7 bankruptcy petition on February 10,
20 2020.
- 21 2. LENARD E. SCHWARTZER is the duly appointed and acting Trustee in this case.
- 22 3. The principal of the Debtor was unable to provide the Trustee with sufficient supporting
23 documentation to evaluate the Debtor's business.
- 24 4. By letter dated April 16, 2020, Trustee requested originals or copies of all the records of
25 Debtor in the possession of Debtor's Accountant, GENSKE, MULDER & COMPANY, LLP,
26 Certified Public Accountants ("Special Accountant").
- 27 5. After conversation with the Special Accountant, the Trustee determined that it was in the
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1 best interest of the bankruptcy estate to employ GENSKE, MULDER & COMPANY, LLP, as
2 special accountant, to prepare the pre-petition 2019 tax return.

3 6. The Trustee's office received the completed 2019 tax return on June 29, 2020. The
4 Trustee was out of the office until July 14, 2020. As the deadline to timely file the tax return was
5 July 15, 2020, the Trustee reviewed and signed the tax return in order to meet the deadline.

6 6. Special Accountant maintains an office at 3187 Red Hill Avenue #110, Costa Mesa,
7 California 92626.

8 7. Special Accountant are certified public accountants.

9 8. It would be in the best interests of the estate for your Applicant to retain GENSKE,
10 MULDER & COMPANY, LLP, as Special Accountant for the estate for the sole purpose of
11 preparing Debtor's 2019 federal tax return.

12 9. Pursuant to the Declaration of GARY B. GENSKE filed concurrently herewith, and to the
13 best of Applicant's knowledge, GENSKE, MULDER & COMPANY, LLP represents no interest
14 adverse to the Debtor, creditors, any other party in interest, their respective attorneys and accountants,
15 the United States trustee, or any person employed in the Office of the United States Trustee.

16 10. Special Accountant has provided pre-petition accounting services to the Debtor.

17 WHEREFORE, your Applicant prays for an order authorizing him to retain GENSKE,
18 MULDER & COMPANY, LLP, as Special Accountant, for the sole purpose of preparing a 2019
19 federal tax return.

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21 Dated: August 4, 2020


LENARD E. SCHWARTZER
Trustee